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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

April 17, 1997

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EO-2

Mr. Charles Schultz
Area Manager
Redding Resource Area
Bureau of Land Management
355 Hemsted Drive
Redding, CA 96002

Dear Mr. Schultz,

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Interlakes Special Recreation Management Area (ISRMA). Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Regulations at 40 CFR Parts 1500-1508, and §309 of the Clean Air Act.

The DEIS evaluates five alternatives for managing recreation, vegetation, wildlife, law enforcement, visual resources, and transportation in the ISRMA, including four action alternatives and a "no action" alternative. All of the action alternatives propose to create four management areas--the Chappie-Shasta OHV Management Area, the Clear Creek & Sacramento River Greenways, and the Iron Mountain Area. Each action alternative proposes different boundaries for the different management areas, and outlines a unique set of management principles to provide a blend of motorized and non-motorized forms of recreation. The preferred alternative, Alternative D, has emerged as a consensus recommendation of the land management agencies (BLM, FS, NPS, and Bureau of Rec.) which administer land within the ISRMA.

EPA commends the planning agencies in their efforts to improve recreation opportunities in the ISRMA through a collaborative effort, and agrees in principle with the concept of creating separate management areas in which different types of recreation are emphasized. We are particularly enthused about the proposal to create two greenways designed to supplement non-motorized recreational opportunities in the ISRMA.

However, EPA objects to the following deficiencies in the Interlakes DEIS. First, the DEIS fails to analyze a full range of reasonable alternatives, as required by NEPA. Second, the DEIS contains insufficient information regarding monitoring efforts to be conducted within the ISRMA. Third, the DEIS lacks information regarding appropriate mitigation measures to offset significant environmental impacts associated with OHV use in the Chappie-Shasta OHV Management Area.

EPA objected to lack of info on monitoring efforts & mitigation to offset significant enviro. impacts associated with OHV use in Chappie-Shasta OHV Mgt Area.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

would encounter each other in the ISRMA, the rate of occurrence should be tolerable" is sufficient to address this concern. Although certain forms of recreation (target shooting, for example) are nearly always incompatible with other types of recreation due to public safety concerns, the compatibility of other recreational combinations should be analyzed on a "trail by trail" basis. For example, mountain biking may be compatible with OHV use in some areas, but not in others. Similarly, mountain biking may be compatible with hiking in some areas, but not in others. The discussion of the alternatives should include a detailed analysis of strategies to reduce recreational incompatibility.

6. All of the action alternatives appear to exceed the carrying capacity of the area (54,720 visits) established in the 1984 OHV EA (DEIS Page 3-11). The EIS should explain how the area can be managed to accommodate the "excess" number of visits without degrading the environment.
7. Plans to purchase private inholdings and trail easements should be described in detail in the EIS.

Road & Trail Development

1. The DEIS does not include an inventory of trails currently in use in the ISRMA, nor an inventory of trails proposed under the action alternatives. The alternative maps provided with the document should clearly designate current and proposed roads and trails within the ISRMA, preferably with color coding to indicate: 1) access restrictions/suitability information (i.e. no motorized transport, 4WD only); and 2) the road or trail's maintenance status, as discussed on Page 4-14 of the DEIS. The use of color is desirable to clearly distinguish roads and trails from management area boundaries and streams.
2. Executive Order No. 11644 requires OHV trails to be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands. We urge the planning agencies to consider impacts to resources, including riparian habitat, water quality, endemic species populations, and soil conditions, when determining the fate of specific roads and trails.

Soil Erosion

1. Text at pages 4-18 and 4-19 of the DEIS states that "Impacts to soil resources are not described under (the "no action") alternative because little information is available regarding the extent of road and trail development under existing plans that constitute the No Action Alternative. For this reason, impacts described would be too speculative and would not provide a meaningful baseline to compare other alternatives to." 40 CFR 1502.15 states that an EIS should "succinctly describe the environment to be affected . . . by the alternatives under consideration." Where this information is not available from available sources, EPA believes it is the responsibility of the planning

implementation of the §319 Nonpoint Source Management Program. Pursuant to CWA §319(b), SWRCB prepared a State Nonpoint Source Management Program (SMP), which was approved by USEPA in January, 1989. Under the CWA, federal programs and activities are subject to the federal consistency review requirements of CWA §319(b)(2)(F) and §319(k). These sections require federal agencies to submit specific assistance programs and development projects to the lead state nonpoint source agency (SWRCB) for review for consistency with California's SMP. Please describe the actions taken by the planning agencies in this regard.

2. The planning agencies should conduct a baseline water quality assessment and include the results in the EIS, particularly in those watersheds which have been targeted for continuing OHV impacts. This information is important for the development, analysis and selection of measures to adequately protect and/or enhance water quality. The DEIS does not contain this information. The DEIS states at Page A-8 that "site specific project plans and accompanying watershed analysis reports are more appropriate to assess most management actions identified within this plan." If in fact the planning agencies intend to conduct watershed analysis using procedures identified by the Federal Ecosystem Management Team (FEMAT), we request that the EIS include an outline, including a timetable, of these subsequent plans and reports. Without such documentation, we do not feel it is appropriate for the DEIS to include language such as "the ISRMA plan embraces the concept of ecosystem management and conforms very well with FEMAT guidelines."

3. It is planning agencies' responsibility to implement appropriate Best Management Practices (BMPs) to enable full protection of beneficial uses of surface waters, attainment of surface water quality standards, and compliance with the Federal Antidegradation Policy (40 CFR 131.12). The EIS should specify what BMPs and nonpoint source pollution control measures would be utilized to assure water quality protection, as well as how and when these measures would be implemented and monitored for implementation, effectiveness, and validation. The EIS should also identify the steps which would be taken if monitoring indicates that the BMPs are not effective. In addition, the EIS should describe how BMPs, standards and guidelines, and other measures designed to minimize water quality impacts would ensure compliance with the Antidegradation Policy. The planning agencies should coordinate with SWRCB and the appropriate Regional Water Quality Control Board to develop BMP implementation and monitoring procedures. In addition, we recommend that the planning agencies refer to USEPA Guidance Specifying Management Measures for Nonpoint Pollution in Coastal Waters (May, 1991), which addresses the latest available technology for management measures to control nonpoint sources.

4. Pursuant to the Federal Antidegradation Policy, existing instream water uses and water quality necessary to protect the existing beneficial uses shall be maintained and protected. Furthermore, where quality of waters exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water, that quality

4. The EIS should give specific baseline information regarding species composition and density in the Greenways. The EIS should also discuss specific mitigation measures which will be implemented to restore the Clear Creek and Sacramento River riparian zones, success criteria for restoration, and monitoring measures.

Air Quality

1. Pursuant to §176(c) of the Clean Air Act, all federal agencies have an affirmative responsibility to assure that their activities conform to the applicable implementation plan as approved for the area. On November 30, 1993, EPA published a Final Rule in the Federal Register on "Determining Conformity of General Federal Actions to State or Federal Implementation Plans." The final rule applies to federal (non-transportation) activities which affect non-attainment or maintenance areas. The ISRMA is located within the Northern Sacramento Valley Air Basin. Although Federal standards have been met for ozone and PM10, the DEIS states at Page 3-34 that the Shasta County Air Quality Management District is not in attainment for ozone and PM10 by California standards. The DEIS should include a summary of relevant air monitoring data, and discuss the potential impact of the various management alternatives on ozone and PM10. The discussion should specifically address impacts from prescribed burning, OHV exhaust, and dust.

2. Pursuant to Executive Order No. 11644, BLM is required to monitor the effects of use of OHVs on lands under its jurisdiction. We recommend that BLM routinely monitor air quality in the proposed Chappie-Shasta OHV Management Area in order to determine whether management measures are adequate to preserve air quality. Executive Order No. 11644 also states, "[o]n the basis of the information gathered, they shall from time to time amend or rescind designations of areas or other actions taken pursuant to this order...."

Mitigation

1. 40 CFR 1502.14(f) states that the EIS must "[i]nclude appropriate mitigation measures not already included in the proposed action or alternatives." Therefore, EPA suggests that the EIS include a separate chapter focusing on appropriate mitigation measures to compensate for significant environmental impacts associated with OHV use in the Chappie-Shasta OHV Management Area under each of the action alternatives.

2. In addition, the new chapter on mitigation should describe mitigation efforts which will be taken to compensate for the loss of critical habitat for the Whiskeytown Deer Herd under each of the action alternatives. Although we note that BLM bases its conclusion that the deer herd should be able to tolerate various levels of OHV use on two research studies (discussed at Page 2-44), and that additional deer habitat will be created through achieving the desired plant communities, we believe it is appropriate for the EIS to provide detail regarding the monitoring standards which will be used to

